



LEAGUE OF WOMEN VOTERS®  
OF CONCORD-CARLISLE

P.O. Box 34, Concord, MA 01742  
my.lwv.org/massachusetts/concord-carlisle

*Making Democracy Work*

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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of

Implementation of Section 621(a) of the  
Cable Communications Policy Act of  
1984 as Amended by the Cable  
Television Consumer Protection and  
Competition Act of 1992

MB Docket No. 05-311

FCC 18-131

**THE CONCORD-CARLISLE LEAGUE OF WOMEN VOTERS  
EX PARTE COMMENTS**

The League of Women Voters of Concord-Carlisle (LWVCC) respectfully submits this ex parte regarding the Second Further Notice of Proposed Rulemaking (FNPRM) released by the Federal Communications Commission (FCC) on September 25, 2018. In the FNPRM, the FCC seeks input on a tentative conclusion that will profoundly, and adversely, impact local public, educational or governmental (PEG) access television services in Concord and Carlisle, Massachusetts: namely, whether cable-related in-kind contributions (like PEG channel and PEG channel capacity) should be counted as part of the 5% cable franchise fee paid to local cable TV providers.

The LWVCC is an active supporter of local cable TV. This year so far the LWVCC has presented local access programs on “Educating the Whole Child,” “Climate Change: Why Do Local Actions Matter?” and several Town Warrant Review sessions. Our latest program, “Go Vote,” is a public service announcement that encourages local voters to attend a candidate forum and also vote in the town general election. Our ability to use local cable TV is a critical tool in the League’s mission to foster informed citizens.

LWVCC - FCC Ex Parte  
MB Docket No. 05-311  
May 3, 2019

Our cable access provider, Minuteman Media Network (MMN), is run by the Town of Concord and provides access to town government meetings, public events, and educational programs on local channels 8, 9, and 99, as well as online (<https://concordma.gov/mmn>). Though run by the Town, MMN is funded entirely through PEG revenues, which come from the cable TV subscribers in town who expect to receive top-level services for their subscriber fee payments.

The FCC should not choose to accept the cable industry association's interpretation of whether in-kind contributions are part of a franchise fee, especially the value of PEG channels. This approach would reduce the proportion of subscriber fees that are actually used to provide the video coverage, and video programming, that LWVCC depends on – to learn, to watch, and to understand our town leaders, and to present informative messages and programs to our members and the wider community audience.

The LWVCC supports earlier comments from other commenters, including the League of Women Voters of Brookline, MA, League of Women Voters Falmouth, MA, and League of Women Voters of Humboldt County, CA; from Senator Edward Markey and Senator Elizabeth Warren; and from the City of Newton, MA, and the Town of Concord, MA Select Board, all of whom encouraged the FCC to refrain from actions that would reduce PEG funding.

For these reasons, the LWVCC strongly opposes the tentative conclusions in the FNPRM and encourages the FCC to not adopt the proposed changes.

Most respectfully,



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Diane Proctor  
President, League of Women Voters of Concord-Carlisle

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